

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
: :  
JUAN AND MARY ELLEN COLON : No. 19-14987-MDC  
Debtors

ANSWER TO MOTION OF WILMINGTON SAVINGS FUND SOCIETY , AS TRUSTEE  
FOR UPLAND LOANFOR RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362  
AND CERTIFICATE OF SERVICE

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted only that payments were late. Debtor has paid over \$4,000 and has paid up date according to the mortgage company in part, Denied that debtor is in arrears and is now paying November 2020.
8. Denied
9. Denied.
10. Denied.
11. No response required.

WHEREFORE Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor

Dated: 11/9/2020

A copy of this Answer is being served on Rebecca Solarz, Esquire, and the Chapter 13 Trustee.

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor